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7 *Attorneys for Debtors and Reorganized
8 Debtors*

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10 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 In re:

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC COMPANY,**

15 **Debtors.**

16 Affects PG&E Corporation
17 Affects Pacific Gas and Electric Company
18 Affects both Debtors

19 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF JENNIFER L.
DODGE IN SUPPORT OF
REORGANIZED DEBTORS'
FURTHER OBJECTION TO
CLAIM NO. 77335 (TODD
GREENBERG)**

[Related to Dkt. Nos. 9455, 9646]

Hearing: September 14, 2021
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Response Deadline: August 12, 2021

1 I, Jennifer L. Dodge, pursuant to Section 1746 of Title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4

5 1. I am the owner and president of Law Offices of Jennifer L. Dodge Inc. and serve
6 as legal counsel for Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary
7 of PG&E Corporation (“**PG&E Corp.**”) and together with the Utility, the “**Debtors**,” or as
8 reorganized pursuant to the Plan,¹ the “**Reorganized Debtors**” in the above-captioned chapter 11
9 cases. I have been a member of the California State Bar Association since 1998 and am admitted
10 to practice in the Northern District of California. I submit this Declaration in support of the
11 *Reorganized Debtors’ Further Objection to Proof of Claim Number 77335, Filed by Todd*
12 *Greenberg* (the “**Further Objection**”), filed contemporaneously herewith.

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14 2. Except as otherwise indicated herein, all facts set forth in this Declaration are
15 based upon my personal knowledge and my review of relevant documents and information. If
16 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
authorized to submit this declaration on behalf of the Reorganized Debtors.

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18 3. In researching the serial number of the refrigerator on the receipt of the Appliance
19 Repair Doctor included in the documentation submitted with Proof of Claim No. 77335, I located
20 a website with a “Serial Number Lookup” that provides the month and date of manufacture for
21 LG appliances based upon their serial numbers. The website is
www.cannonsappliance.com/appliance-age-finder. The “Serial Number Lookup” document I
22 located, along with the Appliance Repair Doctor receipt included with Claim No. 77335, are
23 attached collectively hereto as Exhibit A.

24

25 4. True and correct copies of PG&E’s Responses to Interrogatories and Requests for

26 ¹ On January 29, 2019, the Debtors commenced with the Court voluntary cases under chapter 11
27 of the Bankruptcy Code. By Order dated June 20, 2020 [Docket No. 8053], the Bankruptcy
Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*
28 *Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented
from time to time, and together with any exhibits or schedules thereto, the “**Plan**”). The
Effective Date of the Plan occurred on July 1, 2020. See Dkt. No. 8252.

1 Production of Documents served by Todd Greenberg, along with the non-privileged documents
2 produced in response thereto, are attached collectively hereto as Exhibit B.

3 5. A true and correct copy of Tariff Rule No. 14, Shortage of Supply and Interruption
4 of Delivery, is attached hereto for the Court's reference as Exhibit C. This document is publicly
5 accessible at https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_14.pdf.

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7 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
8 and correct to the best of my knowledge, information, and belief. Executed this 29th day of July,
9 2021.

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12 Jennifer L. Dodge
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